

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Kabbage, Inc., d/b/a KServicing,

Plaintiff,

vs.

Customers Bank,

Defendant.

Civil Action No.

1:22-cv-02101-JPB

**PLAINTIFF KSERVICING’S RESPONSE TO CUSTOMER BANK’S
PARTIAL CONSENT MOTION FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Plaintiff Kabbage, Inc. d/b/a KServicing (“Plaintiff”) hereby files this Response to Defendant Customers Bank’s (“Defendant”) Partial Consent Motion for Extension of Time to Respond to Plaintiffs’ Complaint (the “Motion”). [ECF No. 12].

I. RESPONSE

Plaintiff filed this lawsuit because Defendant has been slow-paying its payments to avoid paying Plaintiff tens of millions of dollars it is owed. Plaintiff agreed by email to a 30-day extension of the deadline to file responsive pleadings, and on Wednesday, June 22, 2022, offered to discuss further with Defendant on a

call that had already been planned for Thursday, June 23, 2022. Defendant filed its motion seeking an extension before the parties' previously scheduled call. Plaintiff and Defendant have since conferred by phone, and Plaintiff agrees to Defendant's request for a 60-day extension.

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DATED: June 27, 2022

Respectfully submitted,

By: /s/ Uchenna Ekuma-Nkama
Georgia Bar No. 957861

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NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Kabbage, Inc. d/b/a KServicing

Plaintiff,

v.

Customers Bank,

Defendant.

CIVIL ACTION NO.
1:22-cv-02101-JPB

CERTIFICATE OF SERVICE AND COMPLIANCE

I certify that on June 27, 2022, I caused the foregoing PLAINTIFF KSERVICING'S RESPONSE TO CUSTOMER BANK'S PARTIAL CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT to be filed with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to counsel of record. I also certify this date that the foregoing was prepared in accordance with N.D. Ga. L.R. 5.1, using Times New Roman font, 14 point.

/s/ Uchenna Ekuma-Nkama
Uchenna Ekuma-Nkama